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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

D-1, MAXIMILIANO MARTIN  
OLMEDO,

Defendant.

Case:2:19-cr-20514  
Judge: Cox, Sean F.  
MJ: Whalen, R. Steven  
Filed: 08-06-2019 At 04:27 PM  
INDI USA V. SEALED MATTER (DA)

VIOL: 18 U.S.C. § 2252A(g)  
18 U.S.C. § 2251(a)  
18 U.S.C. § 2251(e)  
18 U.S.C. § 2422(b)  
18 U.S.C. § 2252A(a)(2)  
18 U.S.C. § 2252A(b)(1)  
18 U.S.C. § 2253  
18 U.S.C. § 2  
18 U.S.C. § 2252A(a)(5)(B)  
18 U.S.C. § 2252A(b)(2)

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**INDICTMENT**

THE GRAND JURY CHARGES:

At all times in this Indictment:

1. Minor Victim 16 (hereinafter "MV-16") was a resident of the Eastern District of Michigan and is a girl with a date of birth in December of 1999.
2. Minor Victim 18 (hereinafter "MV-18") was a resident of Canada and is a girl with a date of birth in April of 2001.
3. Minor Victim 20 (hereinafter "MV-20") was a resident of the Southern District of California and is a girl with a date of birth in May of 2000.
4. Minor Victim 22 (hereinafter "MV-22") was a resident of the Southern District of Mississippi and is a girl with a date of birth in January 1998.
5. During the time periods covered in this Indictment, starting as far back as July of 2013, MAXIMILIANO MARTIN OLMEDO, along with Aaron Wright, William Brooks Davidson, Noel Eisley, Terry Kovac, Bret W. Massey, Felipe Dominguez-Meija, William T. Phillips, and Eric James Robinson, worked together in a group, with others both known and unknown to the Grand Jury, to convince and attempt to convince minor victims, both known and unknown to the Grand Jury, to engage in sexually explicit conduct,

as defined in 18 U.S.C. § 2256(2), on web camera and to record this sexually explicit conduct. Specifically, MAXIMILIANO MARTIN OLMEDO, along with Aaron Wright, William Brooks Davidson, Noel Eisley, Terry Kovac, Bret W. Massey, Felipe Dominguez-Meija, William T. Phillips, and Eric James Robinson, and others both known and unknown to the Grand Jury, conspired together through chat discussions over the Internet to lure minor victims to one or more chatroom-based websites. Once the minor victims appeared in these chatroom-based websites, MAXIMILIANO MARTIN OLMEDO, along with Aaron Wright, William Brooks Davidson, Noel Eisley, Terry Kovac, Bret W. Massey, Felipe Dominguez-Meija, William T. Phillips, and Eric James Robinson, and others both known and unknown to the Grand Jury, enticed and attempted to entice the minor victims to engage in sexual acts, and to lasciviously display their genitals and pubic area, on web camera. MAXIMILIANO MARTIN OLMEDO, along with Aaron Wright, William Brooks Davidson, Noel Eisley, Terry Kovac, Bret W. Massey, Felipe Dominguez-Meija, William T. Phillips, and Eric James Robinson, and others both known and unknown to the Grand Jury, made recordings of this sexual activity and distributed the recordings to one another and to others both known and unknown to the Grand Jury.

COUNT ONE

(Child Exploitation Enterprise, 18 U.S.C. § 2252A(g))

Paragraphs 1-5 of this Indictment are hereby incorporated by reference.

Between the dates of July 2013 and March of 2016, in the Eastern District of Michigan, and elsewhere, the defendant, MAXIMILIANO MARTIN OLMEDO, along with Aaron Wright, William Brooks Davidson, Noel Eisley, Terry Kovac, Bret W. Massey, Felipe Dominguez-Meija, William T. Phillips, and Eric James Robinson (each charged elsewhere), and others both known and unknown to the Grand Jury, knowingly engaged in a child exploitation enterprise by violating Chapters 110 and 117 of Title 18 of the United States Code (specifically 18 U.S.C § 2251, 18 U.S.C § 2422(b), and 18 U.S.C. § 2252A), as a part of a series of felony violations constituting three or more separate incidents and involving more than one minor victim, committing these offenses in concert with three or more other persons; all in violation of Title 18, United States Code, Section 2252A(g).

As part of this Count, the defendant, MAXIMILIANO MARTIN OLMEDO, along with Aaron Wright, William Brooks Davidson, Noel Eisley, Terry Kovac, Bret W. Massey, Felipe Dominguez-Meija, William T. Phillips, and Eric James Robinson (each charged elsewhere), and others both known and unknown to the Grand Jury, committed a series of felony violations. Some of these violations include the following:

	<b>DATE</b>	<b>MINOR VICTIM</b>	<b>PREDICATE FELONY OFFENSE</b>
Predicate #1 (Count Three)	On or about June 2015 through September 2015	MV-16	Production and attempted production of child pornography, in violation of 18 U.S.C. § 2251(a), (e)
Predicate #2 (Count Four)	On or about June 2015 through September 2015	MV-16	Online enticement, in violation of 18 U.S.C. § 2422(b)
Predicate #3	On or about July 2013 through March of 2016	MV-18	Production and attempted production of child pornography, in violation of 18 U.S.C. § 2251(a), (e)
Predicate #4	On or about July 2013 through March of 2016	MV-18	Online enticement, in violation of 18 U.S.C. § 2422(b)
Predicate #5	On or about October 2013 through September 2015	MV-20	Production and attempted production of child pornography, in violation of 18 U.S.C. § 2251(a), (e)
Predicate #6	On or about October 2013 through September 2015	MV-20	Online enticement, in violation of 18 U.S.C. § 2422(b)
Predicate #7	On or about July 2013 through September 2015	MV-22	Production and attempted production of child pornography, in violation of 18 U.S.C. § 2251(a), (e)
Predicate #8	On or about July 2013 through September 2015	MV-22	Online enticement, in violation of 18 U.S.C. § 2422(b)

Predicate #9 (Count Two)	Between the dates of July 2013 and March of 2016		Conspiracy to produce child pornography, in violation of 18 U.S.C § 2251(a), (e)
Predicate #10 (Count Five)	Between the dates of July 2013 and March of 2016		Conspiracy to distribute child pornography, in violation of 18 U.S.C. § 2252A(a)(2), (b)(1)
Predicate #11 (Count Six)	Between the dates of July 2013 and March of 2016		Conspiracy to access with intent to view child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B), (b)(2)

COUNT TWO

(Conspiracy to Produce Child Pornography, 18 U.S.C §§ 2251(a), 2251(e))

Between the dates of July 2013 and March of 2016, in the Eastern District of Michigan, and elsewhere, the defendant, MAXIMILIANO MARTIN OLMEDO, along with Aaron Wright, William Brooks Davidson, Noel Eisley, Terry Kovac, Bret W. Massey, Felipe Dominguez-Meija, William T. Phillips, and Eric James Robinson (each charged elsewhere), did combine, conspire, confederate, and agree together and with others both known and unknown to the Grand Jury, to knowingly employ, use, persuade, induce, entice, and coerce one or more minors to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), for the purpose of producing any visual depiction of such conduct and transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce; such visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and such visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a), (e).

COUNT THREE

(Production of Child Pornography, 18 U.S.C. §§ 2, 2251(a))

On or about June 2015 through September 2015, in the Eastern District of Michigan, and elsewhere, the defendant, MAXIMILIANO MARTIN OLMEDO, along with Aaron Wright, William Brooks Davidson, Noel Eisley, Terry Kovac, Bret W. Massey, Felipe Dominguez-Meija, William T. Phillips, and Eric James Robinson (each charged elsewhere), and others both known and unknown to the Grand Jury, attempted to and did knowingly employ, use, persuade, induce, entice, and coerce a minor, to wit: MV-16, to engage in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2), for the purpose of producing any visual depiction of such conduct and transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce; such visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and such visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2, 2251(a), (e).

COUNT FOUR

(Coercion and Enticement of a Minor 18 U.S.C. §§ 2, 2422(b)).

On or about June 2015 through September 2015, in the Eastern District of Michigan and elsewhere, the defendant, MAXIMILIANO MARTIN OLMEDO, along with Aaron Wright, William Brooks Davidson, Noel Eisley, Terry Kovac, Bret W. Massey, Felipe Dominguez-Meija, William T. Phillips, and Eric James Robinson (each charged elsewhere), and others both known and unknown to the Grand Jury, did knowingly use a facility and means of interstate and foreign commerce (to wit: the Internet) to persuade, induce, entice and coerce a person who had not attained the age of 18 years (to wit: MV-16) to engage in any sexual activity for which any person could be charged with a criminal offense, including but not limited to the production of child pornography as described in 18 U.S.C. § 2256(8), all in violation of Title 18, United States Code, Sections 2, 2422(b).

COUNT FIVE

(Conspiracy to Distribute Child Pornography, 18 U.S.C. §§ 2252A(a)(2),  
2252A(b)(1))

Between the dates of July 2013 and March of 2016, in the Eastern District of Michigan, and elsewhere, the defendant, MAXIMILIANO MARTIN OLMEDO, along with Aaron Wright, William Brooks Davidson, Noel Eisley, Terry Kovac, Bret W. Massey, Felipe Dominguez-Meija, William T. Phillips, and Eric James Robinson (each charged elsewhere), did combine, conspire, confederate, and agree together and with others known and unknown to the Grand Jury, to knowingly distribute child pornography, as defined in 18 U.S.C. § 2256(8), and the images distributed had been shipped and transported using the Internet, a means and facility of interstate commerce, and had been shipped and transported in or affecting interstate or foreign commerce by any means, including by computer; all in violation of Title 18, United States Code, Section 2252A(a)(2) & 2252A(b)(1).

COUNT SIX

(Conspiracy to Access with Intent to View Child Pornography 18 U.S.C. §§ 2252A(a)(5)(B), 2252A(b)(2))

Between the dates of July 2013 and March of 2016, in the Eastern District of Michigan, and elsewhere, the defendant, MAXIMILIANO MARTIN OLMEDO, along with Aaron Wright, William Brooks Davidson, Noel Eisley, Terry Kovac, Bret W. Massey, Felipe Dominguez-Meija, William T. Phillips, and Eric James Robinson (each charged elsewhere), did combine, conspire, confederate, and agree together and with others known and unknown to the Grand Jury, to knowingly access with intent to view material which contained one or more images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved one or more prepubescent minors and one or more minors who had not attained twelve (12) years of age, and which had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and were produced using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B) & 2252(A)(b)(2).

FORFEITURE ALLEGATION

1. The allegations of this Indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 2253 and Title 18, United States Code, Section 2428.

2. If convicted of an offense charged and set forth above, MAXIMILIANO MARTIN OLMEDO shall forfeit to the United States any and all materials and property used and intended to be used in the receipt, possession, and transportation of visual depictions of minors engaging in sexually explicit conduct, and any and all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson

GRAND JURY FOREPERSON

MATTHEW SCHNEIDER  
United States Attorney

s/ Matthew Roth  
MATTHEW A. ROTH  
Assistant United States Attorney  
Chief, Major Crimes Unit  
211 W. Fort Street, Suite 2001  
Detroit, Michigan 48226  
Email: matthew.roth2@usdoj.gov

Dated: August 6, 2019

s/ April Russo  
APRIL N. RUSSO  
KEVIN MULCAHY  
LISANDRA FERNANDEZ-SILBER  
Assistant United States Attorneys  
211 West Fort Street, Suite 2001  
Detroit, Michigan 48226  
Phone: (313) 226-9129  
Email: april.russo@usdoj.gov

ORIGINAL

United States District Court Eastern District of Michigan	Criminal Case
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to

Case: 2:19-cr-20514  
 Judge: Cox, Sean F.  
 MJ: Whalen, R. Steven  
 Filed: 08-06-2019 At 04:27 PM  
 INDI USA V. SEALED MATTER (DA)

Companion Case Information	Companion Case Number: 17-20632
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned: Murphy
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: <i>CR</i>

Case Title: USA v. Maximiliano Martin OlmedoCounty where offense occurred : Wayne and elsewhereCheck One:     Felony                         Misdemeanor                         Petty

- Indictment/  Information --- no prior complaint.  
 Indictment/  Information --- based upon prior complaint [Case number: 18-mj-30634]  
 Indictment/  Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- Corrects errors; no additional charges or defendants.  
 Involves, for plea purposes, different charges or adds counts.  
 Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 6, 2019

Date

  
 April N. Russo  
 Assistant United States Attorney  
 211 W. Fort Street, Suite 2001  
 Detroit, MI 48226-3277  
 Phone: (313) 226-9129  
 Fax: (313) 226-2372  
 E-Mail address: [april.russo@usdoj.gov](mailto:april.russo@usdoj.gov)  
 Attorney Bar #: PA313475

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.